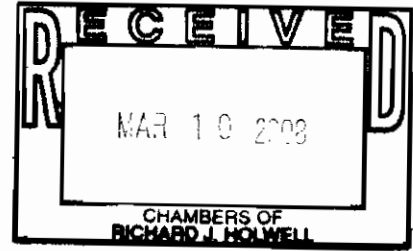


LAW OFFICES  
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March 10, 2008  
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Via Facsimile and ECF  
Honorable Judge Richard J. Holwell  
United States District Court SDNY  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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Re: Lucille Orillaneda v. The French Culinary Institute Docket No. 07 CV 3206 (RJH)

Dear Judge Holwell:

I am writing on plaintiff's behalf to respectfully request an extension of time for the completion of discovery in the above-captioned matter. This request is being necessitated by the parties inability to complete discovery by March 31, 2008, due to discovery issues which the parties are attempting to resolve. Presently, plaintiff is seeking to obtain important documents that are missing from defendants' document production. On February 28, 2008 Plaintiff sent defendant a deficiency letter. Until plaintiff obtains the missing documents, plaintiff is unable to know the witnesses she needs to depose. Defendant has indicated that it will be making the missing document available at the close of discovery, which is unacceptable. Further, Defendant's counsel states that one of two key witnesses plaintiff is seeking to depose is unavailable until after the close of discovery. As defendant has insisted on priority of depositions, plaintiff has not yet been able to depose any witnesses.

Because a conference may be necessary to address the discovery disputes, and defendant's counsel is not permitting plaintiff to obtain the discovery she needs now, it is requested that the deadline for discovery be extended pursuant to the proposed schedule:

- Fact Discovery Completion by May 31, 2008
- Expert Discovery Completion by May 31, 2008
- Delivery of Expert Reports by Plaintiff- April 30; by Defendant - May 31, 2008
- Date for filing Dispositive Motions by July 31, 2008

I have advised defendant's counsel that I would be requesting the adjournment of the discovery deadline because of these outstanding discovery issues, and she has indicated that she has no opposition to plaintiff's request. This extension is being requested to ensure that the outstanding discovery issues are resolved, and that plaintiff receives the requested discovery.

In closing, I thank you for your consideration of this request.

*Apprehension Granted.  
No further extensions. The  
parties should note that*

Respectfully submitted,

*Elizabeth A. Mason*  
Elizabeth A. Mason

cc: Shivani Sonie, Esq. *there is no priority of depositions under the Federal Rules.*

SO ORDERED

*Chin* 0505 3/20/08